

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

COAST TO COAST TITLE, LLC, SOL §  
SOL CITY TITLE, LLC, MAGNOLIA §  
TITLE ARKANSAS, LTD., MAGNOLIA §  
TITLE FLORIDA, LLC, THE PEABODY, §  
BULLDOG LLC, AND JOHN MAGNESS §

*Plaintiffs* §

v. §

§ CIVIL ACTION NO.:4:24-cv-2767

TYRELL L. GARTH, PHILLIP H. §  
CLAYTON, DEBBIE MERRITT A/K/A §  
DEBORAH MERRITT, MATTHEW D. §  
HILL, CHARLES BURNS, P. GARRETT §  
CLAYTON, SCOTT M. REEVES, §  
ARIANE E. YOUNG, §  
TINGLEMERRITT, LLP, §  
STARREX TITLE FLORIDA, LLC, §  
LAURIE COOPER, MARKETSTREET §  
CAPITAL PARTNERS, LLC, §  
MARKETSTREET CAPITAL §  
PARTNERS AR, LLC AND §  
BRIAN A. BREWER §

*Defendants.* §

**Declaration of Laurie Cooper**

1. My name is Laurie Cooper. My birthdate is March 5, 1964. My address is 235 Cocoanut Ave. Sarasota, FL 34236. I have personal knowledge of the facts stated in this declaration.
2. I am a citizen and resident of the State of Florida. I personal knowledge of many of the facts stated herein.
3. I am not now and have never been a resident of or domiciled in Texas.
4. I do not have a bank account in Texas;
5. I have not formed or operated a business in Texas;
6. Neither my employment nor employer is located in Texas;

7. I did not owe a fiduciary duty to a Texas plaintiff, but to entities which have never registered to do business in Texas;
8. I do not own any Texas entities or businesses;
9. I did not advertise or solicit business from Texas residents;
10. I do not maintain any agents for service of process in Texas.
11. I do not own an interest in any assets in Texas.
12. I have never had employees in Texas;
13. I have never applied for or obtained any professional or occupational licenses in Texas;
14. I have not entered into any contract in Texas.
15. I do not have any contracts with Texas entities for performing services in Texas;
16. I have not consented to jurisdiction in Texas and Texas asserting jurisdiction over me was not reasonably foreseeable;
17. I have not committed a tort, in whole or in part, in Texas;
18. I have not purposefully availed myself of the privileges and benefits of conducting business in Texas;

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct.

SIGNED on August 1, 2024, in Sarasota Florida.

  
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Laurie Cooper